

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
at Baltimore

IN RE:

Paul Christopher Robinson DEBTOR(S)	Case No.: 19-14489 Chapter 7
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Deutsche Bank National Trust Company as
Trustee for GSR MORTGAGE LOAN
TRUST 2007-OA2, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2007-
OA2, by Nationstar Mortgage LLC, d/b/a
Mr. Cooper, Servicing Agent

MOVANT

vs.

Paul Christopher Robinson

 and
 Monique D. Almy, Trustee

RESPONDENT(S)

**MOTION SEEKING RELIEF FROM AUTOMATIC STAY AS TO THE
PROPERTY KNOWN AS
29 CANAL SIDE MEWS EAST UNIT#BP29, OCEAN CITY, MD 21842**

Deutsche Bank National Trust Company as Trustee for GSR MORTGAGE LOAN
TRUST 2007-OA2, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-OA2,
by Nationstar Mortgage LLC, d/b/a Mr. Cooper, Servicing Agent (hereinafter MOVANT), by
its undersigned counsel, files this MOTION SEEKING RELIEF FROM AUTOMATIC STAY
AS TO THE PROPERTY KNOWN AS

29 CANAL SIDE MEWS EAST UNIT#BP29, OCEAN CITY, MD 21842, pursuant to 11
U.S.C. SECS. 362 which is a core proceeding pursuant to 28 U.S.C. SEC. 157, and for reasons
states as follows:

ONE

That the above-named Debtor(s) Paul Christopher Robinson (hereinafter
"DEBTOR(S)") initiated proceedings in this Court seeking relief under Chapter 7 of 11 U.S.C.

TWO

That the above-named Monique D. Almy was appointed Interim Trustee of the Estate of
the Debtor(s), is duly qualified, and is so acting.

COHN, GOLDBERG &
DEUTSCH, LLC

ATTORNEYS AT LAW
600 BALTIMORE AVENUE
SUITE 208
TOWSON, MD 21204

410-296-2550

File #: 454131

THREE

That MOVANT is the holder and/or servicer of a Note secured by a Deed of Trust, which encumbers the real property known as 29 Canal Side Mews East Unit#BP29, Ocean City, MD 21842 (the "property") (see attached Exhibit "A"), presently owned by the DEBTOR(S), in the approximate principal amount of \$520,000.00, plus interest, late charges and other costs. Said Instrument is recorded among the Land Records of Worcester County, Maryland.

FOUR

That the DEBTOR(S) is/are in default in payment of the Deed of Trust Note to MOVANT; said default involving non-payment of SEVENTY-THREE (73) pre-petition payment(s) for the period of April, 2013, through April, 2019 in the amount of \$228,365.50, plus late charges, minus suspense of \$133.21, plus any additional payments and late charges thereon that may fall due after the filing of this motion, plus attorney's fees and costs.

FIVE

That MOVANT believes and avers that its security interest concerning the property is not adequately protected.

SIX

That MOVANT has been and continues to be irreparably injured by the Stay of S. 362(a) of the Bankruptcy Code which prevents the MOVANT from enforcing its right under its Deed of Trust.

WHEREFORE, MOVANT, prays this Honorable Court grant the following relief:

- A. That the Court enter an Order lifting the Stay of S. 362 to enable Deutsche Bank National Trust Company as Trustee for GSR MORTGAGE LOAN TRUST 2007-OA2, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-OA2, or its successors and assigns, to enforce its rights under its Deed of Trust, which would enable it to foreclose on the property.
- B. That the Court grant such other and further relief as may be necessary.

/s/ Richard J. Rogers

Richard J. Rogers, Esquire
 Cohn, Goldberg & Deutsch, LLC
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 Towson, MD 21204
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 Email: bankruptcyecf@cgd-law.com
 Federal Bar #: 01980 (MD)
 Attorney for Movant

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 DEUTSCH, LLC

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IN RE:

Paul Christopher Robinson
DEBTOR(S)

Case No.: 19-14489
Chapter 7

Deutsche Bank National Trust Company as
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MOVANT

vs.

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RESPONDENT(S)

*** * * * * CERTIFICATION OF SERVICE * * * * ***
ON

MOTION SEEKING RELIEF FROM AUTOMATIC STAY AS TO THE
PROPERTY KNOWN AS
29 CANAL SIDE MEWS EAST UNIT#BP29, OCEAN CITY, MD 21842

I, the undersigned counsel of COHN, GOLDBERG & DEUTSCH, LLC, 600 BALTIMORE AVENUE, SUITE 208, TOWSON, MD 21204, certify that I am, and at all times hereinafter mentioned was, 18 years of age and that on April 16, 2019, I served a copy of the MOTION SEEKING RELIEF FROM AUTOMATIC STAY AS TO THE PROPERTY KNOWN AS 29 CANAL SIDE MEWS EAST UNIT#BP29, OCEAN CITY, MD 21842, by FIRST CLASS MAIL, on the respondent(s) in this proceeding to:

Paul Christopher Robinson
29 Canal Side Mews East Unit#BP29
Ocean City, MD 21842

and by ELECTRONIC FILING NOTIFICATION CM/ECF to:

respondent(s)' counsel:
Lawrence John Anderson, Esquire
119 N. Henry Street
Alexandria, VA 22314

Monique D. Almy, Trustee
1001 Pennsylvania Avenue, N.W., 10th Fl
Washington, DC 20004-2595

I certify under penalty of perjury that the foregoing is true and correct.

Executed on April 16, 2019

/s/ Richard J. Rogers

Richard J. Rogers, Esquire

Cohn, Goldberg & Deutsch, LLC

600 Baltimore Avenue, Suite 208

Towson, MD 21204

410-296-2550

Fax: 410-296-2558

Email: bankruptcyecf@cgd-law.com

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